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Filed Via ECF

November 1, 2021

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: U.S. v. Jonathan Rodriguez, et al
S-15 Cr 445 (PAE)

Dear Judge Engelmayer:

The undersigned has been appointed by the Court to assist in the representation of defendant Jonathan Rodriguez in his pro se application to the Court for Compassionate Release pursuant to 18 U.S.C. § 3582(c). I respectfully move that the Court extend the deadline for filing an amended application for Compassionate Release until November 30, 2021.

On or about May 28, 2021, the Court re-appointed the undersigned to represent Mr. Rodriguez on his application for Compassionate Release and to file a memorandum in support thereof. As was represented in the defendant's prior requests to continue the filing date for Mr. Rodriguez's compassionate release application, Mr. Rodriguez had been, since May 2021, transferred from one BOP facility to another, never staying long enough to have the Warden of each particular facility issue a decision on Mr. Rodriguez's administrative request for compassionate release. In September 2021, Mr. Rodriguez was transferred to Butner Medium II FCI, in Butner, North Carolina and thereafter filed an administrative request for compassionate release. The undersigned has now been informed by Mr. Rodriguez that the Warden of Butner Medium has denied Mr. Rodriguez's application and that said written denial has been forwarded to the undersigned. As the undersigned is currently on trial before the Honorable Nelson S. Roman in the matter entitled U.S. v. Nachman Helbrans, et. al., DN 7:19-cr-497 (NSR), the undersigned respectfully requests a final extension of 30 days to draft and file a memorandum in support of the defendant's application.

The undersigned has discussed the above request with Dina McLeod, Assistant United States Attorney, who indicates that the government has no objection to the extension of time.


I thank the Court for its consideration of the instant application.

Respectfully submitted,
/s/ *Bruce D. Koffsky*
Bruce D. Koffsky

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 1231.

11/2/2021

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge